

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Ref. No. ____

**ORDER GRANTING THE MOTION OF THE FTX RECOVERY TRUST FOR ENTRY
OF AN ORDER EXTENDING (I) THE CLAIMS OBJECTION DEADLINE
AND (II) THE ADMINISTRATIVE CLAIMS OBJECTION DEADLINE**

Upon the motion (the “Motion”)² of the FTX Recovery Trust for entry of an order (this “Order”) extending the Objection Deadlines through and including January 4, 2027, without prejudice to seek further extensions; and this Court having jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Motion in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Motion and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that no other or further notice is necessary; and upon the record before this Court; and this Court having

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Motion.

found and determined that the relief set forth in this Order is in the best interests of the FTX Recovery Trust and its beneficiaries; and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The Claims Objection Deadline shall be, and hereby is, extended to and including January 4, 2027, without prejudice to the right of the FTX Recovery Trust to seek further extensions of such deadline.
3. The Administrative Claims Objections Deadline shall be, and hereby is, extended to and including January 4, 2027, without prejudice to the right of the FTX Recovery Trust to seek further extensions of such deadline.
4. Notwithstanding any provision in the Bankruptcy Rules to the contrary, this Order shall be immediately effective and enforceable upon its entry.
5. The FTX Recovery Trust is authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.
6. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Motion or the implementation of this Order.

Dated: _____, 2025
Wilmington, Delaware

The Honorable Karen B. Owens
Chief United States Bankruptcy Judge